

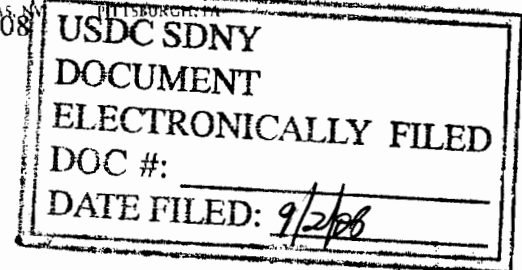
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August 27, 2008

**VIA FACSIMILE (212-805-7924)**

Hon. Sidney H. Stein
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1010
New York, New York 10007

MEMO ENDORSED

Re: Luciano Cohetero and Porfirio Tapia v. New Era
Foods One Inc. d/b/a C Town Supermarket and
Radame J. Perez (a/k/a Jose Perez)
Case No. 08 Civ. 6084 (SHS)

Dear Judge Stein:

We have just been retained to represent Defendants in the above-referenced matter. Given our very recent retention in this matter and to give defense counsel a reasonable opportunity to review the allegations and prepare a response to the Complaint, the Parties have stipulated to extend Defendants' time to answer, move or otherwise respond to the Complaint by three weeks, from August 28, 2008 until September 18, 2008. An executed stipulation regarding the extension was emailed to the Orders and Judgments Clerk earlier today.

An Order for Initial Pretrial Conference was issued promptly upon Plaintiffs' filing of the Complaint on July 9, 2008 scheduling an initial conference for September 12, 2008, at 11a.m. Given the timing of the response to the Complaint, the Parties jointly and respectfully request that the initial pretrial conference be adjourned to a date convenient for the Court after September 18, 2008. With the adjournment, the attorneys for the Parties will be in a better position to assess in advance and discuss at the conference possible discovery issues, motions, the feasibility of settlement or alternative dispute resolution, and further scheduling in this matter. The Parties further request that the date by which the Parties are required to submit their report pursuant to Rule 26(f) be rescheduled to not later than seven (7) days prior to the date of the initial conference. This is the first request to adjourn the initial pretrial conference.

Thank you for your consideration of this joint request.

Respectfully submitted,

JACKSON LEWIS LLP

Jonathan M. Kozak

cc: Michael A. Faillace, Esq., Attorneys for Plaintiffs
(via facsimile)

9/1/08
Initial pretrial conf
adjourned for 9/12 until
9/28 at 9:30 A.M. Rule 26 f
report due 9/19.
So ordered.
Rich W. H.
ESQ.